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9

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**
12

13 JESSE CRUZ, an Individual; MARIA CRUZ, an
Individual; GEOVANY MARTINEZ, an
14 Individual,

15 Plaintiffs,

16 vs.

17 DANNY DURBIN, an Individual; CHAMPION
TRANSPORTATION SERVICES, INC., a
18 foreign corporation; CHAMPION LOGISTICS
GROUP, INC., a foreign corporation; DOES I
19 through XX, inclusive; and ROE BUSINESS
20 ENTITIES I through XX, inclusive,

21 Defendants,
22

23 AND ALL RELATED CASES
24

CASE NO. 02:11-CV-00342-LDG-VCF

Consolidated with:

2:12-cv-0051-LDG-VCF

2:12-cv-01627-LDG-VCF

**STIPULATION AND ORDER TO
CONTINUE DEADLINE FOR RESPONSES
AND REPLIES TO DISPOSITIVE
MOTIONS
(First Request)**

25 Pursuant to F.R.C.P. 6, and Local Rules 6-1, 6-2, and 7-1, the parties, by and through their
26 undersigned attorneys of record, stipulate to a 10 day extension to the deadlines set for responding
27 and replying to dispositive motions. The current response deadline is June 22, 2015; and the
28

1 deadline for replies is currently set for July 6, 2015. The proposed deadline for responses shall be
2 July 2, 2015; and the deadline for replies shall be extended to July 16, 2015.

3 All the remaining parties in this case have stipulated to the extension.

4 Pursuant to F.R.C.P. 6(b)(1), good cause exists for the extension because due to scheduling
5 conflicts with discovery in other cases, i.e. pre-scheduled depositions, a mediation, and a client
6 meeting involving out of state travel, attorneys for Champion and Mr. Durbin have been unable to
7 meet the current response deadline. Counsel for Champion has conferred with the remaining parties
8 in this case and none have objected to the extension.

9 In addition, there is no prejudice or any known conflict with potential trial dates.
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11
12 DATED this 22nd day of June, 2015.

13 /s/ Michael Hottman

14 BRUCE SCOTT DICKINSON

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23 *Attorneys for Danny Durbin and Champion*
24 *Transportation*

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DATED this 22nd day of June, 2015.

/s/ Craig A. Newby

CRAIG A. NEWBY, ESQ.

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Attorneys for Wabash National

DATED this 22nd day of June, 2015.

/s/ Ramzy Ladah

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Attorneys for Plaintiffs

DATED this 22nd day of June, 2015.

/s/ Ronald D. Rosengarten

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Attorneys for Imperium Insurance

ORDER

It is so ordered.


DISTRICT COURT JUDGE

LLOYD D. GEORGE

Dated: 25 June 2015